

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

February 29, 2000

MEMORANDUM

SUBJECT: Response to Public Comments on the Preliminary Risk Assessment for the

Organophosphate Tetrachlorvinphos

FROM: Demson Fuller, Chemical Review Manager

Special Review and Registration Division

Office of Pesticide Programs

TO: OPP Public Docket for Tetrachlorvinphos

This document addressess non-chemical and chemical specific public comments that were received in response to EPA's notice of Availability (64 FR 2644) of preliminary risk assessments for chlorethoxyfos, ethyl parathion, methidathion, phosmet, propetamphos, and tetrachlorvinphos. By "non-chemical-specific" we mean that the comment was submitted to the OPP Public Dockets for each of the six chemicals or for a significant sub-set of them. Also, these non-chemical-comments generally apply to regulatory or science policy issues that are not unique to any one of the chemicals or risk assessment. Chemical-specific comments refer to issues directed towards a particular chemical or risk assessment.

Non-chemical-specific-comments were received from the Natural Resources Defense Council (NRDC) which they felt were relevant to chlorethoxyfos, ethyl parathion, methidathion, phosmet, propetamphos, tetrachlorvinphos, as well as other pesticides used in food. The NRDC submitted similar comments regarding other OP's. To see a complete description of these comments and the Agency's responses, go to www.epa.gov/pesticides/op/chlorethoxyfos/srrd response.pdf on the Internet. EPA Notes that some policy documents referred to here have been updated. For further information see the OPP SAP web page at: http://www.epa.gov/scipoly/pesticides/sap.

Chemical-specific-comments were received from the Hartz Mountain Company for tetrachlorvinphos. The company sought to address various human exposure data gaps presented in the preliminary risk assessment by providing residential exposure and postapplication studies to the Agency. The Health Effects Division reviewed the data and incorporated it in the revised risk assessment.